

February 10, 2000

MEMORANDUM

SUBJECT: Response to Public Comments on the Preliminary Risk Assessment for the Organophosphate Ethyl Parathion

FROM: John Leahy, Chemical Review Manager
Special Review and Reregistration Division
Office of Pesticide Programs

TO: OPP Public Docket for Ethyl Parathion
Docket # 34171

This document addresses non-chemical-specific public comments that were received in response to EPA's Notice of Availability (64 FR 2644) of preliminary risk assessments for the chlorethoxyfos, ethyl parathion, methidathion, phosmet, propetamphos, and tetrachlorvinphos, and one set of comments specific to ethyl parathion from the American Bird Conservancy. By "non-chemical-specific" we mean that the comment was submitted to the OPP Public Dockets for each of the six chemicals or for a significant sub-set of them. Also, these non-chemical-specific comments generally apply to regulatory or science policy issues that are not unique to any one of the chemicals or risk assessments.

Non-Chemical-Specific Comments

Comments were received from the Natural Resources Defense Council (NRDC) which they felt were relevant to chlorethoxyfos, ethyl parathion, methidathion, phosmet, propetamphos, tetrachlorvinphos, as well as other pesticides used in food. The NRDC submitted similar comments regarding other OPs.

To see a complete description of these comments and the Agency's responses, see the public docket #31470 at www.epa.gov/pesticides/op/chlorethoxyfos/srrd_response.pdf on the internet. EPA notes that some policy documents referred to here have been updated. For further information see the OPP SAP web page at: <http://www.epa.gov/scipoly/sap>.

Chemical-Specific Comments

Comments from the American Bird Conservancy generally supported the preliminary ecological risk assessment. They noted the very high toxicity of ethyl parathion to birds, its history

of bird kill incidents, and its potential for other adverse effects. The American Bird Conservancy also commented that although use is restricted to nine crops, volume of use remains high in the Great Plains prairie pothole region, potentially affecting ecosystems critical to birds. Also, because use restrictions earlier imposed by EPA prohibit hand harvesting, opportunities to observe and report wildlife kills and adverse effects have been mitigated. Finally, they comment that continued registration of ethyl parathion conflicts with the Endangered Species Act, the Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and FIFRA, and that no benefits assessment has been presented to support continued use of ethyl parathion.

EPA acknowledges the American Bird Conservancy's comments on ethyl parathion's toxicity and risk to birds. EPA recognizes that wildlife incidents and other adverse effects may not be reported due to reentry restrictions, and EPA remains concerned about other potential adverse effects. EPA is carefully examining both the risks and benefits of continued use of ethyl parathion and will make the reregistration eligibility decision in the context of all pertinent laws and regulations.

Other chemical-specific comments are addressed in the following two documents:
“RESPONSE TO COMMENTS: HED Response to Comments Concerning the EPA Preliminary Human Health Risk Assessment for Ethyl Parathion,” Griffin, R., 9/28/99, and, “Response to Comments on the Terrestrial Risk Assessment for Ethyl Parathion,” McLane, D., et al, 9/10/99.